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Federal Communications Commission
445 12th Street SW
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Subject: Comments on DA 25-219 & GN Docket No. 25-133 to Ensure the Preservation of Critical Communications Regulations Related to Alert & Warning System Infrastructures

Honorable Commissioners,

I appreciate the opportunity to submit comments regarding FCC Public Notice DA 25-219 (GN Docket No. 25-133), which seeks input on identifying regulations that may impose unnecessary burdens and hinder technological innovation. While streamlining regulations can encourage investment and innovation, it is essential to recognize that such efforts must not undermine public safety, or emergency communications capabilities. Regulations supporting the TRACED Act's robocall protections, Wireless Emergency Alerts (WEA), the Emergency Alert System (EAS), multilingual WEA requirements, amateur radio operations, and AM/FM radio systems are all crucial components of our nation's emergency communication infrastructure. Weakening or eliminating regulations related to these could have disastrous consequences for community preparedness and public safety.

The Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act and Its Role in Preventing Alert Fatigue and Emergency Alert Scams

The TRACED Act (S.151, 116th Congress) was established to combat illegal robocalls and protect the integrity of legitimate communication systems, including those used for emergency alerts. Key provisions of the TRACED Act include requiring caller ID authentication through the STIR/SHAKEN framework, the establishment of robocall mitigation databases, and granting the FCC enhanced enforcement authority to penalize violators.

Weakening these essential protections could have severe implications for public safety. Increased phone scams and fraudulent robocalls could flood the communication channels, leading to widespread public distrust of the systems for emergency alerts. The erosion of trust in official alerts could cause individuals to ignore critical messages, potentially resulting in higher rates of injury or death during emergencies. Additionally, if robocall mitigation efforts are relaxed, malicious actors could exploit the lack of regulatory oversight to spoof legitimate government agencies, further damaging public confidence and reducing the effectiveness of emergency warnings.

Maintaining strong TRACED Act regulations is essential to ensuring that emergency alerts remain trusted and distinguishable from fraudulent communications. Safeguarding these protections should be a primary focus of the FCC's regulatory review to avoid undermining the credibility of life-saving alerts.

Wireless Emergency Alerts (WEA) and the Emergency Alert System (EAS)

Wireless Emergency Alerts (WEA) and the Emergency Alert System (EAS) are indispensable tools for disseminating emergency messages to the public. WEA messages are broadcast directly to mobile devices, providing real-time alerts that can save lives during emergencies. These messages are geo-targeted to ensure only those in immediate danger receive them, while the system's accessibility ensures that all mobile users receive alerts without needing subscriptions or applications.

However, deregulating WEA system infrastructures could introduce critical vulnerabilities. Allowing carriers greater discretion to filter or deprioritize alerts could result in significant delays in delivering urgent messages or even prevent them from reaching affected populations entirely. Additionally, weakening geo-targeting requirements would compromise the precision of alert delivery, potentially leading to both over-alerting and under-alerting. Over-alerting, where messages are broadcast too broadly, risks causing public desensitization and prompting individuals to opt out of receiving alerts altogether. Conversely, under-alerting, where the alert coverage area is too narrow, could leave many people uninformed during emergencies.

The EAS, delivered through AM/FM radio, television, and cable, also plays a critical role in public safety, particularly during widespread disasters where power outages are common. AM/FM radio, in particular, provides a resilient communication channel that continues to function even when internet and cellular networks are compromised. Any effort to reduce broadcaster participation in the EAS or allow message filtering would severely undermine the system's effectiveness, especially in rural and underserved areas. The importance of AM/FM radio as a reliable, low-tech alternative cannot be overstated. Ensuring the continuity of this broadcast system is essential for maintaining a robust and trusted emergency communication framework.

Additionally, the FCC has implemented strict protocols and enforcement measures to prevent and address the misuse of emergency alert systems under 47 CFR Part 11. These measures include prohibiting the unauthorized use of emergency alert tones and imposing fines on broadcasters and entities that misuse alert tones for promotional or entertainment purposes. Such enforcement actions are critical to ensuring the public does not become desensitized to life-saving alerts due to improper usage or false alarms.

Weakening enforcement measures or altering standards for permissible use could significantly damage public trust in the EAS and WEA systems. If false alerts are allowed to proliferate due to weakened regulations, the public may increasingly disregard or distrust legitimate emergency notifications. Such desensitization could lead to tragic consequences during real emergencies when timely information is essential for public safety.

To preserve the effectiveness of these systems, it is essential that the FCC maintain existing regulations that protect the integrity, reliability, and accessibility of WEA and EAS systems, including their essential components such as AM/FM radio and enforcement against false alerts.

The Importance of Multilingual Wireless Emergency Alerts (WEA)

The FCC's October 2023 rules requiring wireless providers to implement multilingual WEA templates represent a crucial advancement in making emergency alerts accessible to individuals with limited English proficiency. These templates ensure that alerts can be received in the 13 most commonly spoken languages in the United States, along with American Sign Language (ASL), enabling more inclusive access to emergency information.

If multilingual requirements are eliminated or scaled back, millions of non-English-speaking individuals could be left without critical information during emergencies. Such a reduction in accessibility would exacerbate existing disparities in disaster preparedness and response, particularly within immigrant and minority communities. Additionally, the absence of multilingual alerts could hinder emergency managers' efforts to communicate effectively with all members of their communities, thereby increasing the potential for harm and loss of life.

Preserving multilingual WEA requirements is essential to ensuring that emergency communication remains equitable and effective. The FCC must not lose sight of the importance of language accessibility when reviewing regulations.

The Role of Amateur Radio Operations in Emergency Communications

Amateur radio operations, governed under 47 CFR Part 97, serve as a vital backup communication channel during disasters when conventional systems fail. Unlike cellular networks or internet-based communications, amateur radio systems are independent, resilient, and capable of functioning without commercial power. During large-scale emergencies, amateur radio operators have consistently provided essential communication services to emergency management agencies and communities.

Deregulating or diminishing the role of amateur radio operations could compromise a critical layer of redundancy within the nation's emergency communication framework. Removing coordination requirements or allowing commercial interests to override amateur radio bandwidths could limit the capability of this essential public safety resource. Ensuring the continued availability of amateur radio services is crucial to maintaining a comprehensive and reliable emergency communication system.

The TRACED Act, WEA, EAS, multilingual WEA requirements, amateur radio operations, and AM/FM radio systems are essential public safety tools that must be preserved in any FCC deregulatory efforts. While regulatory efficiency is valuable, it must not come at the expense of public safety, effective emergency communication, and equitable access to life-saving alerts. Maintaining these systems' integrity should be a top priority during the regulatory review process.

Thank you for considering these comments.

Sincerely,

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